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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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JAN 14 1997

In the Matter of)
)
 Advanced Television Systems and)
 Their Impact upon the Existing)
 Television Broadcast Service)

MM Docket No. 87-268

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Directed to: The Commission

SUPPLEMENTAL COMMENTS OF
CENTRAL MISSOURI STATE UNIVERSITY

Central Missouri State University ("CMSU"), by its attorneys, hereby submits the following supplement to its comments filed in this proceeding on November 22, 1996.

In its comments, CMSU expressed interest in retention of vacant NTSC reserved allotments in the following Missouri communities:

<u>Community</u>	<u>Channel</u>
Cape Girardeau	*39
Columbia	*23
Jefferson City	*36
LaPlata	*21
Rolla	*28

CMSU also requested the addition to the DTV table of allotments of comparable NCE-TV channels for each of these communities. As shown in its comments, CMSU's plans to develop NTSC stations using these facilities is predicated on an authorization approved October 10, 1996 by the Missouri Coordinating Board for Higher Education pursuant to Section 173.030(7) of the Revised Statutes of Missouri (Missouri Senate Bill 340, 1995).

Through these supplemental comments CMSU is withdrawing its expressions of interest for the retention of Channel 23 at Columbia and Channel 36 at Jefferson City, Missouri and for the

addition of DTV allotments to those communities.¹ However, CMSU hereby advances additional expressions of interest for the retention of the following vacant NTSC noncommercial allocations:

<u>Community</u>	<u>Channel</u>
Birchtree	*20
King City	*28
Lowry City	*15

Comparable DTV channels should be added to each of these communities for noncommercial use when the transition to DTV occurs.

CMSU plans to file applications for all six of the reserved NTSC allocations (i.e., at Cape Girardeau, LaPlata, Rolla, Birchtree, King City and Lowry City), with appropriate waiver requests, and will make the necessary transition to DTV on the channels allotted to these communities through this proceeding. CMSU's overall plan, as explained in its November 22 comments, is to develop a statewide educational television broadcasting network in Missouri that will serve NCE-TV "white" areas. The modifications reflected in these supplemental comments reflect a refinement in CMSU's plans based on further consideration of unserved areas in Missouri and the best means to reach them. The previously proposed retention of Channels 23 and 36 at Columbia and Jefferson City, respectively, has been dropped in favor of a plan to upgrade CMSU's existing NCE-TV station, KMOS-TV, Channel 6, Sedalia, Missouri. The retention of the reserved NTSC allocations at Birchtree, King City and Lowry City will accommodate coverage of additional NCE-TV "white" areas within the vicinities of those stations.

¹CMSU also has dropped its plans for Channel 26 at Poplar Bluff, which was mentioned in the engineering portion of its comments.

In the supplemental engineering statement attached hereto, CMSU's consulting engineer shows how the additional NTSC existing channels which CMSU wishes to occupy will provide substantial "white" area NCE-TV coverage without unduly disrupting the proposed DTV table of allotments. The study also shows that there are DTV channels available for allotment to each of the additional communities.



Based on the foregoing, and CMSU's November 22, 1996 comments, it is respectfully requested that the following NTSC channels be retained in the Table of Allotments.

<u>Community (Missouri)</u>	<u>Channel</u>
Birchtree	*20
Cape Girardeau	*39
King City	*28
LaPlata	*21
Lowry City	*15
Rolla	*28

It is further requested that reserved DTV channels be assigned to each of these communities to accommodate transition to digital operations.

Respectfully submitted,

CENTRAL MISSOURI STATE UNIVERSITY

By: 
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January 14, 1997

ORIGINAL

D.L. Markley & Associates, Inc.

Consulting Engineers

ENGINEERING STATEMENT

The following engineering statement and attached exhibit have been prepared for Central Missouri State University ("CMSU"), licensee of non-commercial television station KMOS-TV, and are in support of their additional comments concerning the Sixth Further Notice of Proposed Rulemaking in MM docket No. 87-268.

CMSU originally requested that the Commission retain NTSC non-commercial television allocations as shown in the following table.

City	Channel
Cape Girardeau, MO	39
Columbia, MO	23
Jefferson City, MO	36
Poplar Bluff, MO	26
Rolla, MO	28

It was further requested that each of those allocations receive an additional DTV allocation for use in that service.

After further study, it has been determined that portions of the State of Missouri would still not receive public television service if stations on the above allocations were constructed. This includes a portion of Southern Missouri, an area South of Kansas City on the West side of Missouri and the North-west corner of the state. Therefore, it was determined that additional allocations would be needed and that one of the previously requested allocations would not be necessary. It is now requested that the following non-commercial television allocations be retained and that each of them receive a DTV allocation.

City	Channel
Cape Girardeau, MO	39
Rolla, MO	28
La Plata, MO	21
King City, MO	28
Birch Tree, MO	20
Lowry City, MO	15

The impact on the table of allocations proposed in the Sixth Further Notice for DTV use was discussed in the original remarks. The following discussion concerns the allocations at King City, Birch Tree and Lowry City. It has been determined that the DTV table of allocations will not be adversely affected by retaining these allocations for non-commercial use.

Retaining Ch. 20 at Birch Tree would prevent it from being allocated to Jefferson City, Missouri and to Jonesboro, Arkansas as proposed in the Sixth Further Notice. However, it would appear that multiple other channels exist which could be used for those two communities. The Commission is referred to the data attached which is from Broadcast Caucus's "Other Available Channels List" which was provided by MST Staff. That list contains 31 other channels for Channel 19 at Jonesboro, AR and 37 other channels for Jefferson City, MO. It is also noted that the Poplar Bluff, Jefferson City and Columbia, MO allocations are no longer proposed for use which frees them for assignment elsewhere.

The use of channel 28 at King City would affect the allocation of channel 28 to Columbia, MO for Channel 8 and channel 27 to Topeka, KS for channel 27. Again, the "Other Available Channels" list shows 31 other channels to be available for Topeka and 44 other channels available for channel 8 at Columbia, MO.

The final allocation of channel 15 at Lowry City affects only the change for channel 27 in Springfield, MO. The same list shows 37 channels available for that allocation.

In summary, retention of the requested NTSC channels for non-commercial television use would not adversely affect the DTV table of

allotments. Multiple channels are available for use for each of the allotments which would be affected by such retention which would allow the expansion of public television and instructional programming throughout the State of Missouri. It is noted that all of the effects of the three channels discussed in these comments are in smaller markets, well outside of major metropolitan areas where allocation difficulties might occur.

The attached map clearly demonstrates that essentially the entire state of Missouri would be served by either existing stations or stations operating on the allocations which the Commission has been asked to retain. Applications are now being prepared for those facilities and will be filed with the Commission within the next few weeks. If permits are granted, CMSU, acting for the State of Missouri, will construct both the NTSC and DTV facilities promptly. It is anticipated that all stations, with interconnecting microwave systems, would be fully operational in both NTSC and DTV within 48 months.

The preceding statement and attached exhibits have been prepared by me or under my direction and are true and correct to the best of my knowledge and belief.



Donald L. Markley, P.E.

Jan. 13, 1997

**FROM BROADCAST CAUCUS'S
"OTHER AVAILABLE CHANNELS LIST"
PROVIDED BY MST STAFF
OCTOBER 9, 1996**

Station at: MO JEFFERSON CITY Existing channel 13 ATV channel 12
 3 4 11 15 22 23 31 33 34 35 36 38 40 42 43 44 48 49 50 51 52 53 54 55 56
 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MO JEFFERSON CITY Existing channel 25 ATV channel 20
 3 4 15 22 23 31 33 34 35 36 38 40 42 43 44 48 49 50 51 52 53 54 55 56 57
 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MO JOPLIN Existing channel 12 ATV channel 54
 2 4 5 6 9 11 24 32 38 40 45 46 47 48 50 55 56 58 59 60 61 63 64 65 66
 67 68 69

Station at: MO JOPLIN Existing channel 16 ATV channel 14
 4 5 9 15 32 40 45 46 58 59 60 61 63 64 65 66 67 68 69

Station at: MO JOPLIN Existing channel 26 ATV channel 25
 2 4 5 6 9 11 24 32 38 40 45 46 47 48 50 55 56 58 59 60 61 63 64 65 66
 67 68 69

Station at: MO KANSAS CITY Existing channel 4 ATV channel 29
 7 12 36 43 44 52 53 54 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 5 ATV channel 46
 7 12 36 44 47 52 53 54 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 9 ATV channel 24
 7 8 10 12 36 44 52 53 54 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 19 ATV channel 26
 7 12 18 35 36 44 52 53 54 55 57 58 59 60 61 63 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 32 ATV channel 31
 7 12 15 17 36 44 52 53 54 55 57 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 41 ATV channel 42
 7 12 36 43 44 52 53 54 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 50 ATV channel 21
 7 12 36 44 51 52 53 54 55 57 58 59 60 64 65 66 67 68 69

Station at: MO KANSAS CITY Existing channel 62 ATV channel 34
 7 12 18 35 36 44 52 53 54 55 57 58 59 60 61 63 64 65 66 67 68 69

Station at: MO KIRKSVILLE Existing channel 3 ATV channel 51
 2 4 5 6 8 9 11 12 14 17 18 19 20 21 23 24 25 28 30 33 34 35 36 39 40

Station at: AR FORT SMITH Existing channel 24 ATV channel 17
4 7 9 10 14 16 20 21 22 25 26 43 44 54 55 59 60 61 62 63 64 65 66 67 68
69

Station at: AR FORT SMITH Existing channel 40 ATV channel 39
7 9 10 12 14 16 20 21 22 25 26 27 30 34 35 36 43 54 55 58 59 60 61 62 63
64 65 66 67 68 69

Station at: AR GOSNELL Existing channel 46 ATV channel 0
27 36 45 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: AR HARRISON Existing channel 31 ATV channel 0
2 4 7 8 9 11 15 20 30 32 36 38 40 41 42 43 47 48 49 55 56 58 59 60 61
62 63 64 65 66 67 68 69

Station at: AR HOT SPRINGS Existing channel 26 ATV channel 27
5 6 18 19 20 21 22 23 24 28 32 33 34 40 43 44 45 49 50 51 59 60 61 62 63
64 65 66 67 68 69

Station at: AR JONESBORO Existing channel 8 ATV channel 9
2 4 7 11 12 22 28 32 35 36 38 44 51 52 53 54 55 56 57 58 59 60 61 62 63
64 65 66 67 68 69

Station at: AR JONESBORO Existing channel 19 ATV channel 20
2 4 11 12 22 28 32 35 36 41 42 44 51 52 53 54 55 56 57 58 59 60 61 62 63
64 65 66 67 68 69

Station at: AR JONESBORO Existing channel 48 ATV channel 49
2 4 11 12 22 28 32 35 36 38 44 51 52 53 54 55 56 57 58 59 60 61 62 63 64
65 66 67 68 69

Station at: AR LITTLE ROCK Existing channel 2 ATV channel 53
5 8 18 19 20 21 22 23 32 33 34 44 49 50 51 52 55 59 60 61 62 63 64 65 66
67 68 69

Station at: AR LITTLE ROCK Existing channel 4 ATV channel 47
5 10 13 18 19 20 21 22 23 32 33 34 35 44 46 48 49 50 51 56 58 59 60 61 62
63 64 65 66 67 68 69

Station at: AR LITTLE ROCK Existing channel 7 ATV channel 54
5 8 18 19 20 21 22 23 32 33 34 44 49 50 51 52 55 59 60 61 62 63 64 65 66
67 68 69

Station at: AR LITTLE ROCK Existing channel 11 ATV channel 12
5 10 13 18 19 20 21 22 23 32 33 34 35 44 46 48 49 50 51 56 58 59 60 61 62
63 64 65 66 67 68 69

Station at: MN ROCHESTER Existing channel 47 ATV channel 46
7 12 40 41 42 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MN ST. CLOUD Existing channel 41 ATV channel 40
13 14 15 19 36 47 48 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MN ST. PAUL Existing channel 2 ATV channel 38
7 8 13 16 19 21 24 36 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67
68 69

Station at: MN ST. PAUL Existing channel 5 ATV channel 26
6 7 12 13 19 25 35 36 43 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67
68 69

Station at: MN ST. PAUL Existing channel 17 ATV channel 33
7 8 13 16 19 21 24 36 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67
68 69

Station at: MN THIEF RIVER FALLS Existing channel 10 ATV channel 59
3 5 7 14 16 17 22 23 25 27 28 30 31 32 33 35 36 40 42 43 44 45 46 48 49
50 51 52 54 55 57 60 61 62 63 64 65 66 67 68 69

Station at: MN WALKER Existing channel 12 ATV channel 35
2 3 4 5 6 8 10 11 14 16 17 24 26 27 29 30 31 32 33 34 38 39 40 41 43
44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68
69

Station at: MN WORTHINGTON Existing channel 20 ATV channel 19
3 6 7 21 27 32 33 34 38 40 41 45 47 49 50 51 52 53 54 56 57 58 59 60 61
62 63 64 65 66 67 68 69

Station at: MO CAPE GIRARDEAU Existing channel 12 ATV channel 32
10 19 20 25 31 33 36 38 40 45 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MO CAPE GIRARDEAU Existing channel 23 ATV channel 22
7 10 19 20 25 36 38 40 45 53 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MO COLUMBIA Existing channel 8 ATV channel 28
2 3 4 5 9 14 15 22 23 30 31 33 34 35 36 39 40 41 42 43 44 46 47 48 49
50 51 52 53 54 55 56 57 58 60 61 62 63 64 65 66 67 68 69

Station at: MO COLUMBIA Existing channel 17 ATV channel 18
2 3 4 10 14 15 16 22 23 30 31 32 33 34 35 36 38 39 40 41 42 43 47 48 49
50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: MO HANNIBAL Existing channel 7 ATV channel 29
2 4 5 6 17 18 19 20 24 25 30 34 35 36 40 41 42 44 45 46 47 48 49 50 52
53 54 55 56 57 58 60 61 62 63 64 65 66 67 68 69

Station at: KS SALINA Existing channel 18 ATV channel 15
 5 6 7 14 17 20 21 30 31 32 33 35 38 39 40 41 42 43 44 45 47 50 52 53 54
 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: KS TOPEKA Existing channel 11 ATV channel 23
 3 6 7 8 10 17 20 25 30 33 35 36 43 44 45 51 52 53 54 55 57 58 59 60 61
 63 64 65 66 67 68 69

Station at: KS TOPEKA Existing channel 13 ATV channel 22
 3 6 7 8 17 20 25 30 33 35 36 43 44 45 51 52 53 54 55 57 58 59 60 61 63
 64 65 66 67 68 69

Station at: KS TOPEKA Existing channel 27 ATV channel 28
 3 6 7 8 17 20 25 30 33 35 36 43 44 45 51 52 53 54 55 57 58 59 60 61 63
 64 65 66 67 68 69

Station at: KS TOPEKA Existing channel 49 ATV channel 48
 3 6 7 8 17 20 25 30 33 35 36 43 44 45 47 51 52 53 54 55 57 58 59 60 61
 63 64 65 66 67 68 69

Station at: KS WICHITA Existing channel 3 ATV channel 51
 4 5 6 17 21 22 23 27 38 39 40 41 42 43 44 45 47 48 49 50 52 53 54 55 56
 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: KS WICHITA Existing channel 10 ATV channel 26
 4 5 6 17 21 22 23 27 38 39 40 41 42 43 44 45 47 48 49 50 52 53 54 55 56
 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: KS WICHITA Existing channel 15 ATV channel 0
 5 6 14 16 17 21 22 38 39 40 41 42 43 44 45 47 48 49 53 54 55 56 57 58 59
 60 61 62 63 64 65 66 67 68 69

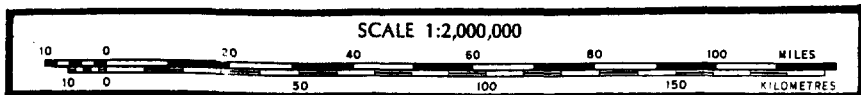
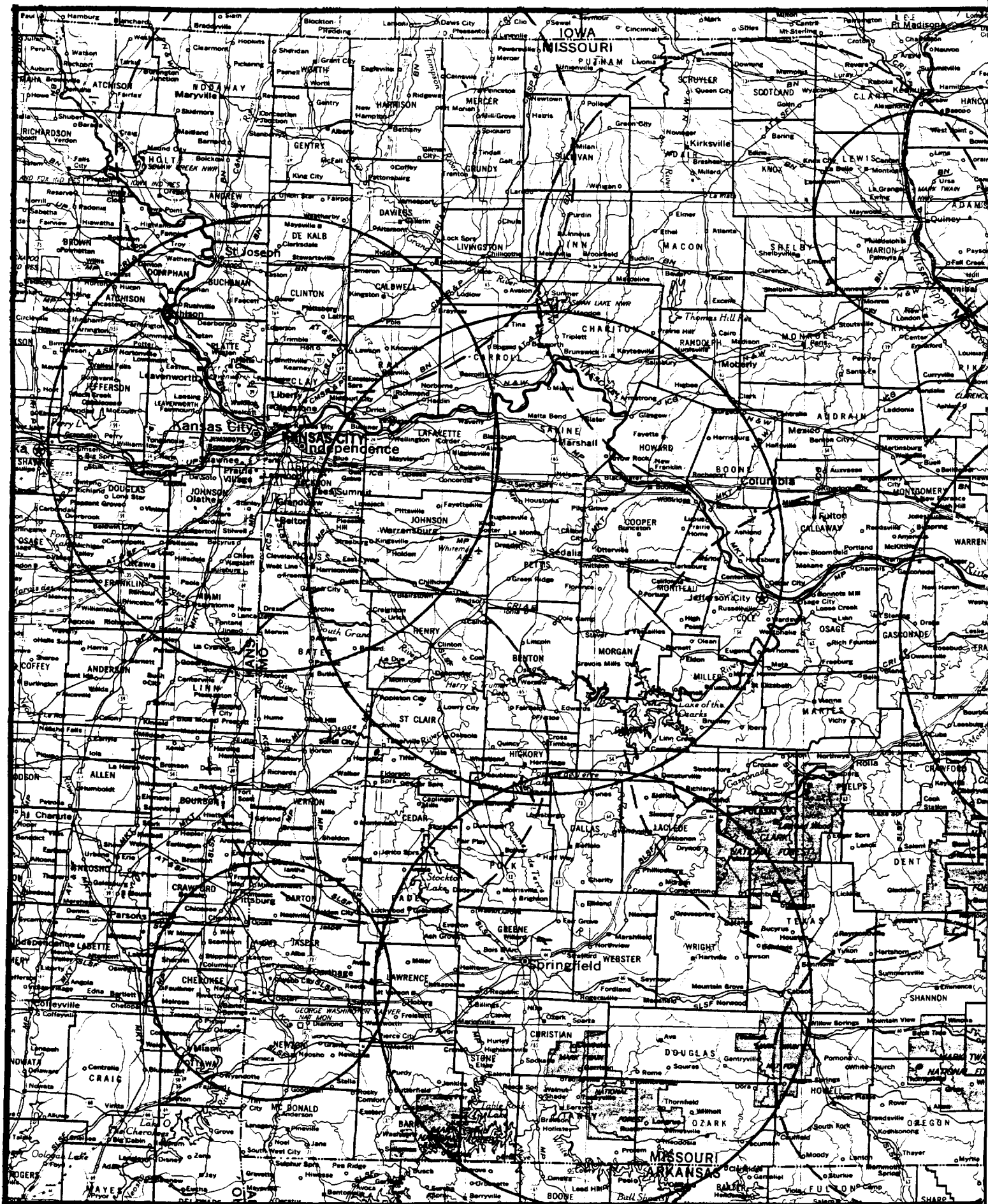
Station at: KS WICHITA Existing channel 24 ATV channel 25
 4 5 6 17 21 22 23 27 38 39 40 41 42 43 44 45 47 48 49 50 52 53 54 55 56
 57 58 59 60 61 62 63 64 65 66 67 68 69

Station at: KS WICHITA Existing channel 33 ATV channel 32
 5 6 17 21 22 31 34 38 39 40 41 42 43 44 45 46 47 48 49 53 54 55 56 57 58
 59 60 61 62 63 64 65 66 67 68 69

Station at: KY ASHLAND Existing channel 25 ATV channel 26
 5 6 23 24 40 44 45 46 47 51 52 63 64

Station at: KY ASHLAND Existing channel 61 ATV channel 60
 5 6 14 23 39 40 44 45 46 47 51 52 62 63 64 66 68

Station at: KY BEATTYVILLE Existing channel 65 ATV channel 7
 5 6 9 10 11 12 13 20 23 24 31 33 43 49 50 51 55 62 64





EXISTING: _____
PROPOSED: - - - - -

EXISTING AND PROPOSED SERVICE CONTOURS

**PUBLIC TELEVISION COVERAGE IN THE
STATE OF MISSOURI INCLUDING STATIONS
IN ADJOINING STATES**

**Central Missouri State University
Warrensburg, Missouri
January, 1997**